

THE HONORABLE JOHN H. CHUN

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

LAFFON GLYMPH,

Plaintiff,

vs.

CT CORPORATION SYSTEMS AND
COMPUCOM,

Defendant

CASE NO. 2:21-cv-01704-JHC

**MOTION TO COMPEL
DEFENDANTS COMPUCOM TO PRODUCE
INSURANCE POLICY**

NOTING DATE FEB 5TH 2025

**MOTION TO COMPEL DEFENDANTS COMPUCOM TO PRODUCE INSURANCE
POLICY**

I. INTRODUCTION

Plaintiff, Laffon Glymph, by and through undersigned counsel, respectfully moves this Court for an order compelling Defendants CompuCom (collectively, "Defendants") to produce the relevant insurance policy pursuant to Rule 26 of the Federal Rules of Civil Procedure.

II. STATEMENT OF FACTS

On September 17, 2024 Plaintiff served Defendants with a request for production of documents, including any and all insurance policies under which any insurer may be liable to satisfy part or all of a judgment in this action or to indemnify or reimburse for payments made to satisfy the judgment.

To date, Defendants counsel has failed to produce the requested insurance policy, despite multiple requests and attempts to resolve this matter without court intervention.

MOTION TO COMPEL
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PRODUCE INSURANCE POLICY

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1 III. ARGUMENT

2 A. Plaintiff's Request Is Proper Under Rule 26.

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4 Under Rule 26(b)(1) of the Federal Rules of Civil Procedure, parties may obtain discovery
5 regarding any non-privileged matter that is relevant to any party's claim or defense. Plaintiff's
6 request for the insurance policy is proper, as it is likely to lead to the discovery of admissible
7 evidence regarding Defendants' ability to satisfy a judgment in this case.

8 B. Defendants' Counsel Refusal to Produce the Insurance Policy Is Unjustified.

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10 Defendants counsel has not provided any valid objection to the production of the insurance
11 policy. Mr. Holt's refusal to comply with Plaintiff's request is unjustified and hinders the
12 discovery process.

13
14 C. Good Faith Efforts to Resolve the Dispute Have Been Unsuccessful.

15 Plaintiff has made good faith efforts to resolve this dispute without court intervention, including
16 sending an email to Defendants' counsel Mr. Holt and attempting to meet and confer. Despite
17 these efforts, Defendants counsel Mr. Holt has failed to provide the requested documents.

18
19 IV. CONCLUSION

20 For the foregoing reasons, Plaintiff respectfully requests that this Court grant Plaintiff's Motion
21 to Compel and order Defendants to produce the requested insurance policy within 5 days of the
22 Court's order. Plaintiff further requests any other relief that the Court deems just and proper.

23 Dated: 22nd of January 2025

24 Respectfully submitted

25 /s/ Laffon Glymph

26 Laffon Glymph Pro Se